633191 #25 11-16-07 MQ

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

---X
CHINESE AUTOMOBILE DISTRIBUTORS
OF AMERICA, LLC
Plaintiff,

v.

MALCOLM BRICKLIN, ET.AL.,
Defendants

---X

O7 Civ. 4113 (LLS)

MOTION TO ADMIT COUNSEL
PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of:

Applicant's Name: JAN MICHAEL MORRIS, ESQ.
Firm Name: LAW OFFICES OF JAN MICHAEL MORRIS, PA
Address: PO BOX 276153
City/State/Zip: BOCA RATON, FL 33427
Phone Number: 561-395-4195
Fax Number: 561-338-8698

U.S. DISTRICT COURT FILED
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S.D. OF N.Y.

is a member in good standing of the Bar of the State of Florida,* and the General Bar of the United States District Court for the Southern District of Florida. There are no pending disciplinary proceedings against Jan Michael Morris, Esq. in any State or Federal court.

Dated: November 6, 2007
New York, New York

Respectfully submitted,

By:____________________
Sponsor's Name: Charles T. Lee, Esq.
Sponsor's SDNY Bar: CL 5934
Firm Name: McCarter and English, LLP
245 Park Ave.
New York, New York, 10167
212-609-6800

By:____________________
Jan Michael Morris, Esq.

* See Attached

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DECLARATION OF
SPONSORING ATTORNEY
IN SUPPORT OF MOTION
TO ADMIT COUNSEL PRO HAC VICE

State of New York)
) **SS:**
County of New York)

Charles T. Lee , being duly sworn, hereby deposes and says as follows:

1. I am a member of the bar of this Court and of the law firm of McCarter & English, LLP, attorneys for the Plaintiff. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in reliance on facts provided to me and in support of Defendants' motion to admit **Jan Michael Morris, Esq.** as counsel pro hac vice to represent Defendants in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law on April 11, 1977. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known **Jan Michael Morris, Esq.** since October 31, 2007.

4. Jan Michael Morris, Esq. is a member in the firm of the Law Offices of Jan Michael Morris, Esq.

5. I have found Jan Michael Morris, Esq. to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

6. Accordingly, I am pleased to move the admission of **Jan Michael Morris, Esq.**, pro hac

vice.

7. I respectfully submit a proposed order granting the admission of **Jan Michael Morris, Esq.** , pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit **Jan Michael Morris, Esq.** , pro hac vice, to represent Defendants in the above captioned matter, be granted.

Dated: November 6, 2007
New York, New York

Respectfully submitted,

____

Name of Movant: Charles T. Lee, Esq
SDNY Bar Code: CL 5934
245 Park Ave.
New York, New York, 10167
212-609-6800

The Florida Bar

JOHN F. HARKNESS, JR.
EXECUTIVE DIRECTOR

651 EAST JEFFERSON STREET
TALLAHASSEE, FLORIDA 32399-2300

850/561-5600
WWW.FLORIDABAR.ORG

State of Florida)

County of Leon)

In Re: 651291
Jan Michael Morris
Law Offices of Jan Michael Morris
P.O. Box 276153
Boca Raton, FL

I HEREBY CERTIFY that I am the duly appointed custodian of membership records of The Florida Bar.

I FURTHER CERTIFY that the records in the office of the Clerk of the Supreme Court of Florida indicate that said attorney was admitted to practice law in the State of Florida on May 14, 1987.

I FURTHER CERTIFY that the records in the office of The Florida Bar indicate that the above attorney is a member of The Florida Bar in good standing.

Dated this 7th day of November, 2007.

Willie Mae Shepherd
Supervisor, Membership Records
The Florida Bar

WMS/ssW1:R10

UNITED STATES DISTRICT COURT
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---X

ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION

Upon the motion of attorney for Charles T. Lee, Esq. (Sponsor) and said sponsor attorney's declaration in support;

IT IS HEREBY ORDERED that JAN MICHAEL MORRIS, ESQ.:
Firm Name: LAW OFFICES OF JAN MICHAEL MORRIS, PA
Address: PO BOX 276153
City/State/Zip: BOCA RATON, FL 33427
Telephone/Fax: 561-395-4195/561-338-8698
Email Address: jan@themorrislawoffice.com

is admitted to practice pro hac vice as counsel for the Defendants, Malcolm Bricklin, Jonathan Bricklin, Barbara Bricklin Jonas, Michael Jonas, Sania Teymeny and Visionary Vehicles, LLC, in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:
City, State:

____
United States District/Magistrate Judge

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a bona fide effort has been or will be made to resolve or minimize the issues and a true and correct copy of the Motion to Appear Pro Hac Vice was faxed/mailed/emailed this 13 day of Nov., 2007 to: Charles Lee, Esq 245 Park Ave. New York, New York, 10167, Stephen Jacobs, Esq., Attorney for Defendant Scott Gildea 120 Broadway, 27th Floor, New York, NY 10271, Richard Scarola, Esq, Former Attorney for Defendants, Malcolm Bricklin, Jonathan Bricklin, Barbara Bricklin Jonas, Michael Jonas, Sania Teymeny and Visionary Vehicles, LLC 888 Seventh Ave. 45th Floor, New York, NY 10106

Respectfully submitted,

JAN MICHAEL MORRIS, ESQUIRE
LAW OFFICES OF JAN MICHAEL MORRIS, PA
P.O. Box 276153
Boca Raton, Florida 33427
(561) 395-4195
Email: jan@themorrislawoffice.com

BY:

JAN MICHAEL MORRIS
Fla. Bar No: 651291
Attorney for Defendants:
Malcolm Bricklin, Jonathan Bricklin,
Barbara Bricklin Jonas, Michael Jonas,
Sania Teymeny and Visionary Vehicles, LLC

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NOTICE OF MOTION

PLEASE TAKE NOTICE, that upon the annexed November 6, 2007 Declaration of, Charles T. Lee Esq., the exhibit attached hereto, Defendants Malcolm Bricklin, Jonathan Bricklin, Barbara Bricklin Jonas, Michael Jonas, Sania Teymeny and Visionary Vehicles, LLC, will move this Court without hearing, before the Honorable Louis L. Stanton, United States District Judge, at the United States Courthouse, 900 Pearl St., NY, NY 10007, for an Order admitting Jan Michael Morris, Esq. to appear Pro Hac Vice and granting such other relief as the Court deems proper.

Dated: New York, New York
November, 2007

Respectfully Submitted,
McCarter & English, LLP

By: ____________________
Charles T. Lee (CL 5934)
Attorneys for Plaintiff
245 Park Ave.
New York, New York, 10167
212-609-6800

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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DECLARATION

Charles Lee, Esq, hereby declares the truth of the following, under penalty of perjury, pursuant to 28 USC 1746:

1. I am an attorney, duly admitted to practice law before this Court. I am a member of the law firm of McCarter and English, LLP, attorney for the Plaintiff named below, and as such, I am familiar with the facts and circumstances of this case. This Declaration is submitted in support of Jan Michael Morris, Esq.'s Motion to Appear Pro Hac Vice, and any such other relief the Court deems proper.

2. Attached is a true and correct copy of Jan Michael Morris, Esq.'s Motion to Appear Pro Hac Vice, Declaration in Support thereof, and proposed Order admitting Jan Michael Morris, Esq. to appear Pro Hac Vice and granting such other relief as the Court deems proper.

Dated: New York, New York
November 6, 2007

Respectfully Submitted,
McCarter and English, LLP

By: ______________________
Charles T. Lee, Esq (CL 5934)
Attorneys for Plaintiff
245 Park Ave.
New York, New York, 10167
212-609-6800

CC: Stephen Jacobs, Esq.
120 Broadway, 27th Floor
New York, NY 10271
Attorney for Defendant Scott Gildea

Richard Scarola, Esq
888 Seventh Ave. 45th Floor
New York, NY 10106
Former Attorney for Defendants
Malcolm Bricklin, Jonathan Bricklin,
Barbara Bricklin Jonas, Michael Jonas,
Sania Teymeny and Visionary Vehicles, LLC